

UNDER SEAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

2:19mj480

AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT

I, Kyle Raines, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a special Agent with the Naval Criminal Investigative Service (NCIS), and have been since July 2018. I am currently assigned to the NCIS Norfolk Field Office. I completed training at the Federal Law Enforcement Training Center (FLETC) in Glynco, GA. While at FLETC, I completed Criminal Investigation Training Program (CITP) and NCIS Special Agent Basic Training Program (SABTP). I received training in areas including civilian law, the Uniform Code of Military Justice (UCMJ), interviews and interrogations, crime scene processing, defensive tactics, and various investigative techniques.
2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.
3. I have conducted an investigation of the offenses described in this affidavit. As a result of my investigation, a review of reports made by other law enforcement officers, and in speaking with other law enforcement officers who have been involved in the investigation, I am familiar with the circumstances of this on-going investigation. I have not included each and every fact known to me in this affidavit, but only the facts I believe are necessary to establish probable cause to believe that MARIO CORDEAU PARHAM (PARHAM) has engaged in the crime of, through the use of the telephone and other instrument of interstate or foreign commerce, and in or affecting interstate or foreign commerce, willfully making a threat, and maliciously conveying

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false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate an individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of an explosive, in violation of 18 U.S.C. 844(e).

PERTINENT FEDERAL CRIMINAL STATUTES

4. 18 U.S.C. § 844(e) proscribes whoever, through the use of the mail, telephone, telegraph, or other instrument of interstate or foreign commerce, or in or affecting interstate or foreign commerce, willfully makes any threat, or maliciously conveys false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of fire or an explosive.

CASE BACKGROUND

5. The Norfolk Field Office of NCIS is investigating three separate telephonic bomb threats made to the Colonna's Shipyard (the Shipyard) in Norfolk, VA. One person has been identified as the account owner related to each phone number utilized to make all three bomb threats to the Shipyard. Each call has been placed using a number owned by Pinger Inc. or TextNow Inc.¹ and was associated with one person, namely MARIO CORDEAU PARHAM.

6. Beginning on August 13, 2019, NCIS responded to a duty regarding a telephonic bomb threat was called into the main reception desk at the Shipyard in Norfolk, VA regarding the USS

¹ These companies provide free and paid mobile applications (apps) that allow users to call or text from their phone using the app. The user's app is assigned its own phone number, apart from the number associated with the phone thru Verizon, T-Mobile, or other cellular phone provider.

GUNSTON HALL (LSD 44). The USS GUNSTON HALL is currently dry docked at the Colonna's Shipyard and is a vessel belonging to the United States Navy.

7. For the first threat, a receptionist answered the telephone call. Specifically, on August 13, 2019, she received the call from phone number (757) 350-4598 at approximately 0935 hours from a caller she identified as a male. The caller stated "there's a bomb on the GUNSTON HALL, you have twenty minutes to leave the boat." The receptionist detailed the caller talked slowly and seemed "off." She requested the caller to repeat himself and he said "leave the boat now." Command Master Chief Kimberly FERGUSON indicated the USS GUNSTON HALL began ship clearing procedures at 1020 hours, to include evacuation of the ship and a search for suspicious packages. At 1116 hours the USS GUNSTON HALL was deemed safe and clear of any bombs.

8. Initial background checks for phone number (757) 350-4598 revealed this phone number is owned by Bandwidth Inc. An exigent circumstance request was made to Bandwidth Inc. and Bandwidth Inc. advised this number is owned by Pinger Inc., who operates this phone number using the Bandwidth network.

9. An exigent circumstance request was made to Pinger Inc. Pinger Inc. provided information relating to phone number (757) 350-4598. Pinger Inc. advised this phone number was created using the email address cloversclovers73@gmail.com. Additionally, Pinger Inc. provided a timestamp for the last time this account was accessed and associated an IP address with it. The last time this account was accessed was on August 13, 2019 at 09:23:11 on the IP address 107.77.204.219. An IP address search indicated AT&T Mobility owns the IP Address. Pinger Inc. also provided a device Identification of "20da4c59-102a-4bcb-a5e4-f84e74bd8406,

4d047cfa-52c0-4bdc-98b1-fccd69eff1ca, 5759b9aa-bcf9-44c6-9853-53ff0a75d72c.” This device identification is specific to Google (Android) cellular phones.

10. An open source search for the email address cloversclovers73@gmail.com revealed this email address is associated with a Facebook profile for PARHAM. Facebook provided the Facebook Business Record for the profile aforementioned. The business record indicated PARHAM’s last latitude and longitude coordinates while using the Facebook application was at “36.8354316 -76.2755087” on August 13, 2019 at 10:14:10. Additional research regarding the latitude and longitude placed the location as the Colonna’s Shipyard.

11. Contact was made with the Security Manager at the Shipyard. The Security Manager indicated all contracted employees have a Colonna’s Shipyard badge specifically assigned to them. BURNS stated all employees scan these badges when entering and leaving Colonna’s Shipyard. BURNS provided PARHAM’s scan history report for August 13, 2019 that indicated PARHAM scanned into Colonna's Gate at 0614 hours and left Colonna's Gate at 1334 hours.

12. On August 21, 2019 at approximately 1240 hours, the Colonna’s Shipyard received a second bomb threat via a telephone call at the main reception desk. A receptionist who answered the call stated the call was from phone number (301) 686-7692. She stated the caller was a male who was friendly when he was inquiring if this was the Colonna’s Shipyard located off Indian River Road. BROWN-WILLIAMS told the caller it was Colonna’s Shipyard and the caller changed his tone and said, “I’m in the yard and I got a bomb and I’m going to blow the boats up.” The caller hung up afterwards and did not give BROWN-WILLIAMS the chance to reply. The USS GUNSTON HALL was cleared at 1313 hours and was later deemed safe and clear of any bombs at 1431 hours.

13. Initial background checks for phone number (301) 686-7692 revealed this phone number is owned by Bandwidth Inc. An exigent circumstance request was made to Bandwidth Inc. and Bandwidth Inc. advised this number is owned by Pinger Inc., who operates this phone number using the Bandwidth network.

14. An exigent circumstance request was made to Pinger Inc., and Pinger Inc. provided information relating to phone number (301) 686-7692. Pinger Inc. advised this phone number was created using the email address marioparham861@gmail.com. Pinger Inc. additionally provided a timestamp for the last time this account was accessed and associated an IP address with it. The last time this account was accessed was on August 21, 2019 at 12:41:14 on the IP address 107.77.202.43. Search of the IP address used indicated AT&T Mobility owns the IP Address. Pinger Inc. also provided a device Identification of "7cb3b2d7-ccb3-40c4-bd0f-1ab71b23fc93." This device identification is specific to Google (Android) cellular phones. Pinger Inc. also indicated this account was created on August 21, 2019 at 12:37:55, which is just three minutes before the call was placed.

15. Contact was made with Neil BURNS, Security Manager who provided PARHAM's scan history report for August 21, 2019. The report indicated PARHAM scanned into Colonna's Gate at 0634 hours and left Colonna's Gate at 1344 hours.

16. On August 26, 2019, at approximately 1208 hours, the Colonna's Shipyard received a third telephonic bomb threat via the telephone. A receptionist who answered stated a male called from the phone number (804) 256-1208 and stated "you all think I'm playing. This is my last time calling. I'm going to blow up the shipyard and kill myself if I don't get my." The receptionist attempted to say something while the caller was talking and the caller hung up. The Shipyard stopped all operations and began bomb threat clearing procedures at approximately

1250 hours. Machine Account Chief Petty Officer Jason WALTERS advised the ship also began clearing procedures on USS GUNSTON HALL at the same time. Colonna's Shipyard and the USS GUNSTON HALL were deemed safe and clear at approximately 1440 hours.

17. Initial background checks for phone number (804) 256-1208 revealed this phone number is owned by Bandwidth Inc. An exigent circumstance request was made to Bandwidth Inc. and Bandwidth Inc. advised this number is owned by TextNow Inc., who operates this phone number using the Bandwidth network.

18. An exigent circumstance request was made to TextNow Inc., and TextNow Inc. provided information relating to phone number (804) 256-1208. TextNow Inc. advised this phone number was created using the email address marioparham861@gmail.com. Additionally, TextNow Inc. provided a timestamp for when the phone number placed the call and provided an associated IP address. The associated IP address of 107.77.202.139 was used to place the call on August 26, 2019 at 12:08:12. Search of the IP address used indicated AT&T Mobility owns the IP Address. Additionally, TextNow Inc. provided that the phone number (804) 256-1208 was assigned to the marioparham861@gmail.com account at 11:48:21 on August 26, 2019. This number was assigned approximately 20 minutes prior to the bomb threat call received.

19. Contact again was made with the Security Manager, who stated that the scan history report for August 26, 2019, indicated PARHAM scanned into Colonna's Gate at 0638 hours and did not scan out.

CONCLUSION

20. Based on the information and evidence set forth above, I respectfully submit that there is probable cause to believe that MARIO CORDEAU PARHAM committed the following offenses:

COUNT ONE: On August 13, 2019, MARIO CORDEAU PARHAM, through the use of the telephone and other instrument of interstate or foreign commerce, and in or affecting interstate or foreign commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate an individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of an explosive, in violation of 18 U.S.C. 844(e);

COUNT TWO: On August 21, 2019, MARIO CORDEAU PARHAM, through the use of the telephone and other instrument of interstate or foreign commerce, and in or affecting interstate or foreign commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate an individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of an explosive, in violation of 18 U.S.C. 844(e);

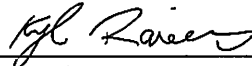
COUNT THREE: On August 26, 2019, MARIO CORDEAU PARHAM, through the use of the telephone and other instrument of interstate or foreign commerce, and in or affecting interstate or foreign commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate an individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of an explosive, in violation of 18 U.S.C. 844(e);

21. Accordingly, I request that a complaint and arrest warrant be issued charging Mario PARHAM with such offenses.

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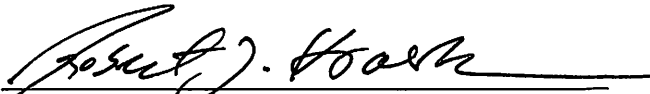
FURTHER AFFIANT SAYETH NOT.

Respectfully submitted,



Kyle Raines
Special Agent
Naval Criminal Investigative Service

Subscribed and sworn to before me on August 29, 2019.



UNITED STATES MAGISTRATE JUDGE